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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON MICHAEL SHAMO,

Defendant.

Case No. 2:16-cr-631DAK

NOTICE RELATING TO EXPERT
TESTIMONY PURSUANT TO
Fed.R.Crim.Pro. 16(a)(1)(G) AND
Fed.R.Evid. 702

Judge Dale A. Kimball

COMES NOW, Special Assistant United States Attorney Michael Gadd, and pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and Rule 702 of the Federal Rules of Evidence, hereby gives notice of the United States' intention to call Forensic Chemist Stanley "Frank" Platek of the FDA Forensic Chemistry Center as an Expert Witness in the above-captioned manner. Mr. Platek will offer expert testimony regarding the forensic examination (photo documentation, instrumental analysis, etc.) and method development of compromised FDA-regulated products (the tablets bearing markings of oxycodone medications seized from Mr. Shamo and his co-defendants) using

vibrational spectroscopic instrumentation, and how the examination of these substances was performed at the FDA's Chemistry Center.

Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure requires that the summary of expert testimony provided by the government "describe the witnesses' opinions, the bases and reasons for those opinions, and the witnesses' qualifications." The United States intends that the lab reports, which are attached as Attachment A, shall serve as a description of the witness' opinions as required by the rule. The United States intends that the curriculum vitae (CV), which is attached as Attachment B, shall serve as a description of the witness' qualifications.

RESPECTFULLY SUBMITTED this 26th day of November, 2018.

JOHN W. HUBER
United States Attorney

/s/Michael Gadd
MICHAEL GADD
Special Assistant United States Attorney